

**Certified Public Accountants**

1001 State Street • Suite 1300 • Erie, PA 16501

Phone: (814) 454-1997 • Fax: (814) 454-1476

E-mail: skm@skmico.com

website: www.skmco.com

James A. Schaffner, CPA, CVA
Charles G. Knight, CPA, CVA
Matthew J. Minnaugh, CPA, CVA

Daniel E. Sloppy, CPA, CVA, MBA
Dennis W. Grow, CPA/PFS
Timothy M. Baird, CPA/PFS
Peter M. Eaglen, CPA
David J. Herbe, CPA
Janel M. Kitcey, CPA
Amy E. Denlinger, CPA
Kelly L. Cook, CPA
Timothy R. Fox, CPA
Jean M. Nielsen, CPA
Brian E. Baker, CPA
Carrie N. Jelicks, CPA
Michael J. Tellers, CPA
Steven E. Ramsey, EA

September 16, 2005

Paul J. Susko, Esquire
Kubinski, Susko & Schonthal
The Gideon Ball House
135 East Sixth Street
Erie, PA 16501

RE: David E. Sidelinger v. Harbor Creek School District.

Dear Attorney Susko:

We have been retained by your firm to review certain records and documents pertaining to the above-referenced litigation and render our professional opinion with respect to the following issue:

- The economic loss, if any, to David E. Sidelinger as a result of his alleged wrongful termination on March 13, 2000

During the course of our engagement, we have reviewed the following documents:

1. Forms W-2 of David E. Sidelinger for the years 1998 through 2000
2. Pay stubs for David E. Sidelinger dated October 15, 1998, September 15, 1999, December 15, 1999, February 15, 2000 and April 14, 2000
3. Federal income tax return Form 1040 (pages 1 & 2) for the years 1998 through 2004. Schedule F Profit or Loss from Farming for the year 1998
4. Pretrial Narrative Statement of Plaintiff David E. Sidelinger dated September 16, 2004
5. The Contract between Harbor Creek School Board and Harbor Creek Education Association Until 1st Day of School 2009-2010 (Salary Schedule Section only)
6. The Contract between Harbor Creek School Board and Harbor Creek Education Association Until 1st Day of School 2005-2006
7. The Contract between Harbor Creek School Board and Harbor Creek Education Association Until 1st Day of School 2001-2002
8. The Contract between Harbor Creek School Board and Harbor Creek Education Association Until 1st Day of School 1997-1998

Members Of:

American Institute of Certified Public Accountants
Pennsylvania Institute of Certified Public Accountants

Paul J. Susko, Esquire
August 31, 2005
Page 2

9. Copies of invoices from Harbor Creek School District for COBRA insurance coverage dated May 30, 2000, August 1, 2001, November 5, 2001 and August 1, 2002
10. COBRA Termination Notice dated February 24, 2003
11. Commonwealth of Pennsylvania Public School Employees' Retirement System (PSERS) Active Member Handbook
12. Welcome to the Public School Employees' Retirement System's "Foundations of Your Future" Program handbook
13. PSERS Revised Statement of Account – as of June 30, 2004
14. PSERS Revised Statement of Account – as of June 30, 2003
15. PSERS Statement of Account – as of June 30, 2002
16. PSERS Statement of Account – as of June 30, 2001
17. PSERS Statement of Account – as of June 30, 2000
18. Social Security Statement for David E. Sidelinger dated May 10, 2005
19. Copy of David Sidelinger's check number 512 dated January 26, 2000 indicating payment of \$393.00 to HCEA for payment of fair share union dues for FYE 1999-2000 year

The following summarizes our understanding of the pertinent material facts:

Mr. Sidelinger was born on August 19, 1952. His wife, Sally J. Sidelinger, was born October 1, 1958. Mr. Sidelinger had been employed by the Harbor Creek School District as a public school teacher since August 1980. Mr. Sidelinger was a science teacher at the Harbor Creek High School in 2000, when he was suspended and terminated by the School District for refusing to wear a photo ID badge because it conflicted with his religious and moral beliefs that he should not adorn himself with any badges.

As a result of the of the School District's actions, Mr. Sidelinger lost his employment as a school teacher, at which time he was earning an annual salary of \$52,500. Since his termination, Mr. Sidelinger alleges that he has been unable to obtain the same or similar type of employment.

Prior to the alleged actions of the School District, Mr. Sidelinger had planned to retire after the completion of 40 years of service with the School District (which would have occurred at the end of the 2019-2020 school-year effective August 31, 2020). Mr. Sidelinger has 19.72 years of service with the School District and is currently eligible for PSERS pension benefits beginning at age 62. However, the monthly pension benefits that Mr. Sidelinger is scheduled to receive are substantially lower than what they would have been had he continued working until his planned retirement date.

ANALYSIS

The economic loss, if any, as a result of the termination of employment is calculated based on past and future losses. The past and future losses represent the additional amount of wages and pension benefits that would have been earned, but for the alleged

Paul J. Susko, Esquire
August 31, 2005
Page 3

actions of the Harbor Creek School District, calculated through the remaining life expectancies of Mr. and Mrs. Sidelinger.

Past and Future Earnings

We established the earnings base for Mr. Sidelinger based on our review of the above-mentioned documents. We have calculated Mr. Sidelinger's but for past earnings for the period May 1, 2000 through August 31, 2005, based on the annual teacher salaries as provided under the School District's contract with the Harbor Creek Education Association (ECEA).

We have calculated Mr. Sidelinger's past and future teacher earnings but for the alleged actions of the Harbor Creek School District, assuming that Mr. Sidelinger elected to retire as he had planned effective August 31, 2020. It is our understanding that Mr. Sidelinger has been unable to find replacement employment to mitigate the past lost earnings. In addition to employment as a teacher, Mr. Sidelinger owns a maple syrup & farming business in which he works part-time. During the summer months, Mr. Sidelinger occasionally works as a self-employed roofer. According to Mr. Sidelinger, this income is included with his farming business and is reported on Schedule F Profit or Loss from Farming of Mr. Sidelinger's income tax return. We were not provided with copies of Mr. Sidelinger's Schedule F, other than for the 1998 year. According to the income tax returns, however, the farming activities (which include the roofing income) have resulted in losses for the years 1998 through 2004. Mr. Sidelinger has represented to us that the farming and roofing activities have always been performed in addition to his employment as a teacher and that the loss of his employment as a teacher has not enabled him to earn additional income from his farming and roofing activities. Therefore, for purposes of this report, we have been instructed not to consider any mitigating earnings in our determination of damages.

The past but for teacher wages amount to **\$299,067.62**. We calculated Mr. Sidelinger's projected future but for teacher wages from September 1, 2005 through his anticipated retirement date of August 31, 2020. The projected future but wages amount to **\$908,625.00**. Please refer to **Exhibit 1**.

In this report, losses are calculated under Pennsylvania state law which requires use of the "total offset method" as explained in Kaczowski v. Bolubasz, 421 A.2d 1027 (Pa. 1980), which holds, "as a matter of law that future inflation shall be presumed equal to future interest rates with these factors offsetting."

Fringe Benefits

The value of the potential fringe benefits which an employee receives depends to a certain extent on the wage and salary compensation which would have been earned. Government data indicate that, in general, the value of the fringe benefits which an employee receives tends to be positively correlated with the employee's annual income.

Paul J. Susko, Esquire
August 31, 2005
Page 4

We have reviewed the Contract between the Harbor Creek School District and Harbor Creek Education Association in order to determine what fringe benefits were provided to Mr. Sidelinger. Mr. Sidelinger received the following fringe benefits:

- Employer contribution to social security
- Employer provided health insurance (100% of the premium cost for annual coverage in Blue Cross Hospitalization, Blue Shield Medical Surgical and Major Medical Benefits for employees and their dependents)
- Employer provided group term life insurance coverage in the amount of \$20,000 per employee
- Employer provided group dental/vision care insurance (100% of the premium cost for employees and their dependents)

In considering the employer's total contribution to social security, which amounts to 7.65% of Mr. Sidelinger's gross pay, we believe it is appropriate to only include the portion that is designated for the retirement benefit, which is known as the Old Age Survivors Insurance (OASI) component. Social Security is the short name for Old Age Survivors, Disability, and Health Insurance (OASDI). There are three components to which the employer's contribution is earmarked. The first component is Health Insurance (HI) better known as Medicare, which amounts to 1.45% of the total. Mr. Sidelinger has already accumulated enough credits under the social security system to qualify for Medicare coverage. The Disability Insurance (DI) component amounts to 0.9% and the Old Age Survivors Insurance (OASI) component amounts to 5.30%. Therefore, we will only include the 5.30% portion relating to OASI for purposes of this report.

We were not provided with the employer's actual cost for providing the health and life insurance coverage. We have, therefore, estimated these benefits as a percent of payroll based on certain information presented in the U.S. Chamber of Commerce annual publication, "*Employee Benefits*", a study of fringe benefits based on data collected from the previous year. Based on this study, we have estimated the medical and life insurance premiums to amount to 9.5% and 0.4% of payroll, respectively.

[Source: Martin, Gerald D., *Determining Economic Damages*, James Publishing Incorporated, Costa Mesa, CA, Chapter 4, Page 9, Table 22, July 2005]

We were able to determine the employer's cost to maintain dental and vision care insurance, based on the COBRA coverage invoices paid by Mr. Sidelinger. Dental and vision care insurance amounted to approximately 1.9% of payroll at the date of termination.

Combining the various fringe benefits as a percentage of payroll amounts to 17.1% as follows:

Paul J. Susko, Esquire
 August 31, 2005
 Page 5

Social Security (OASI Component only)	5.3%
Medical insurance premiums	9.5%
Life insurance premiums	0.4%
Dental/vision coverage	<u>1.9%</u>
Total	17.1%

Past but for fringe benefits, therefore, amount to **\$51,140.56** (17.1% x \$299,067.62), and future but for fringe benefits amount to **\$155,374.88** (17.1% x \$908,625.00).

Worklife Expectancy and Life Expectancy

We have relied on Mr. Sidelinger's statement concerning his planned retirement date with an effective date of August 31, 2020. We have referred to life expectancy tables in *National Vital Statistics Reports*, Volume 53, No. 6, November 10, 2004 (National Center for Health Statistics, Washington, D.C.: U.S. Department of Human Services) and have determined Mr. and Mrs. Sidelinger's remaining life expectancies as of March 13, 2000 to be 30.8 years and 40.4 years, respectively. As a result, we have calculated the economic loss through August of 2040, which is the life expectancy of the youngest spouse who is Mrs. Sidelinger.

Discount Rate

As previously indicated, Pennsylvania state law requires the use of the total offset method which holds that future inflation shall be presumed to equal future interest rates with these factors offsetting. The basic assumption is that the rate of growth in wages will be exactly equal to and thus offset the rate of interest available on safe investments. Because of the total offset method, there is no need to project future wage increases, nor is there a need to convert future wages to a present value.

Retirement Benefits

According to the PSERS Active Member Handbook, an employee will be eligible for a normal retirement benefit if you terminate public school employment and:

- Is age 62 or older with at least one full year of credited service or
- Is age 60 or older with 30 or more years of credited service or
- Have attained 35 years of credited service regardless of age.

A Class T-D member will receive an annual retirement benefit based on 2.5 percent, payable monthly under the following formula:

$$2.5\% \times \text{Final Average Salary} \times \text{Years of Credited School Service}$$

Paul J. Susko, Esquire
August 31, 2005
Page 6

The final average salary for a full-time employee is the highest average compensation received as an active member during any three non-overlapping periods of 12 consecutive months. This is typically the average of your 3 highest years.

According to the PSERS Statement of Account dated April 13, 2005, Mr. Sidelinger has accumulated 19.72 years of service (T-D Service Class). Accordingly, at age 62 (August 19, 2014) Mr. Sidelinger will be eligible to begin receiving normal PSERS retirement pension benefits.

On August 31, 2014, Mr. Sidelinger will begin receiving monthly PSERS retirement benefits, payable for life. As a retired T-D Service Class Member, Mr. Sidelinger's annual pension benefit will be determined using an average of his three highest annual salaries, which has been calculated by PSERS to amount to **\$51,353**. The annual benefit calculation for a T-D Service Class retiree, therefore, amounts to **\$25,317.03** ($2.5\% \times \$51,353 \times 19.72$ years of service) or a **\$2,109.76** per month using the Maximum Single Life Annuity option.

According to the PSERS Active Member Handbook, there are several options in the way that you may receive your retirement benefit. These options include:

Maximum Single Life Annuity

Option 1

Option 2

Option 3, and

Option 4 (Customized)

Maximum Single Life Annuity – This option provides the highest check amount for the retiree's lifetime. If at the time of your death, the retiree has not received an amount equal to his contributions and interest, the balance will be paid to the beneficiary.

Option 1 – Under this option, your monthly benefit is reduced. The reduction is based on your sex and age at the time of retirement. In exchange for this reduction, a "Present Value" is determined at the time of your retirement. The Present Value is the amount allocated to fund the pension benefit over your expected life. If at the time of your death, you have not received an amount equal to the Present Value of your account, the balance will be paid to your beneficiary.

Option 2 – Under this option, your monthly benefit is reduced. This reduction is based on your sex and age and the sex and age of your designated survivor annuitant. **At the time of your death, the same monthly benefit that was paid to you will be paid to your survivor annuitant for life.**

Option 3 – Under this option, your monthly benefit is reduced. This reduction is based on your sex and age and the sex and age of your designated survivor annuitant. You may

Paul J. Susko, Esquire
August 31, 2005
Page 7

name only one survivor annuitant. **At the time of your death, one-half of the monthly benefit that was paid to you will be paid to your survivor annuitant for life.**

Option 4 – This is a customized benefit that is only used in limited circumstances when none of the other options meet a retiree's needs. Consultation with a PSERS regional representative is necessary if you are considering this option. We have not considered any type of customized benefit option.

The PSERS website allows members to log into their account and access a retirement benefits calculator which will provide the monthly benefit amounts under the Maximum Single Life Annuity and Options 1 through 3 based on a given set of assumptions. Due to time constraints, we were unable to obtain a formal report of anticipated retirement benefits from PSERS. We do not believe, however, that there are any significant differences in the monthly benefits as calculated using the PSERS website retirement calculator than would be reported on a formal written request. Therefore, we have relied on the printout from the website retirement calculator to determine the reduced monthly benefits under Options 2 and 3. For purposes of this report, we will not consider Options 1 or 4. A printout of the projected actual and projected but for PSERS retirements benefit estimate calculator calculations are provided at **Exhibits 2 and 3**, respectively.

Exhibit 4 presents the projected actual PSERS retirement benefits to be received under the Maximum Single Life Annuity, which amounts to **\$415,622.72** based upon Mr. Sidelinger's life expectancy. **Exhibit 5** presents the projected actual PSERS retirement benefits to be received under Option 2, in which Mr. Sidelinger's spouse would be entitled to the same reduced monthly benefit upon Mr. Sidelinger's death, payable for the remainder of her life, which we have calculated to be **\$556,097.71**. Under Option 3, Mr. Sidelinger's surviving spouse will be entitled to receive 50 percent of his current monthly benefit upon Mr. Sidelinger's death, payable for the remainder of her life. We have calculated the amount of the actual PSERS retirement benefits under this option to be **\$491,448.75**. Refer to **Exhibit 6**.

But for the alleged actions of the Harbor Creek School District and assuming a planned retirement date effective August 31, 2020, Mr. Sidelinger would receive monthly projected PSERS retirement benefits, payable for life, beginning in September of 2020. Under this scenario, Mr. Sidelinger's annual pension benefit will be determined using an average of his three highest but for annual salaries, which would amount to **\$60,575.00**. The annual projected but for PSERS retirement benefit calculation for a T-D Service Class retiree, therefore, amounts to **\$60,575.00** (2.5% x \$60,575.00 x 40 years of service) or **\$5,047.92** per month using the Maximum Single Life Annuity option.

Exhibit 7 presents the projected but for PSERS retirement benefits to be received under the Maximum Single Life Annuity, which amounts to **\$625,942.08** based upon Mr. Sidelinger's life expectancy. **Exhibit 8** presents the projected but for PSERS retirement benefits assuming that Option 2 was selected, which we have calculated to be

Paul J. Susko, Esquire
August 31, 2005
Page 8

\$989,940.00. We have calculated the amount of the actual PSERS retirement benefits under Option 3 to be **\$825,673.94**. Refer to **Exhibit 9**.

The pension benefit calculations assume that Mr. Sidelinger will live to approximately December 30, 2030, and Mrs. Sidelinger will live to approximately August 6, 2040.

Adjustment for Employee Contributions to the PSERS Pension Plan

The defined benefit pension plan provided by PSERS is partly funded by employee contributions. The correct valuation of a pension loss when the employee is required to make a contribution is to deduct the amount of that contribution from the loss. Mr. Sidelinger's PSERS contribution rate was 5.25% at the time of his termination. Effective with the provisions of Act 9 which became effective July 1, 2001, the employee contribution rates were changed based upon an employee's membership class. According to the PSERS records, Mr. Sidelinger's contribution rate as a Service Class T-D employee is 6.50%. Therefore, we have reduced the pension loss by an amount equal to 5.25% of the but for wages that would have been earned through June 30, 2001 and by 6.50% of the but for wages that would have been earned by Mr. Sidelinger from July 1, 2001 through his projected date of retirement. This adjustment amounts to **\$18,683.53** on the but for past wages through August 31, 2005 (refer to **Exhibit 10**) and **\$59,060.63** on the future but for wages ($\$908,625.00$ but for future wages \times 6.50% contribution rate = $\$59,060.63$).

Adjustment for Fair Share Union Dues

We have made an adjustment to reduce the damages by the estimated amount of fair share union dues that would have been required of Mr. Sidelinger had he remained an employee of the School District. This adjustment amounted to **\$7,900** ($\395×20 years).

Adjustment for Sick Pay Accumulation Credits

The School District's contract with HCEA allows for ten (10) sick days per year. Unused sick days are allowed to be carried forward.

Appendix F of the School District's contract with HCEA provides an option for retiring employees who receive full retirement benefits from the PSERS to elect one of the following two options: (1) Eligible retiring teachers can receive a credit calculated at the following rate of \$225.00 per year of Harbor Creek School District service, or (2) Eligible retiring teachers can convert unused accumulated sick leave at the date of retirement to a cash payment at the rate of \$110.00 per sick day.

As of the date of termination, Mr. Sidelinger had accumulated 122 unused sick days, which will be available for credit when he reaches normal retirement age. Based on the fact that Mr. Sidelinger had accumulated 122 sick days over the course of 19.72 years of service, it is reasonable to conclude that he would have accumulated a significant number of additional unused sick days had he continued working until his planned retirement

Paul J. Susko, Esquire
 August 31, 2005
 Page 9

date. Therefore, we have made an adjustment, based on the historical ratio of unused sick days, to estimate the additional number of unused sick days that would be available for credit upon Mr. Sidelinger's planned retirement date. The calculation results in additional damages of \$13,750 and is calculated as follows:

- 122 unused sick days at termination divided by 19.72 years x 40 years = 247 total projected unused sick days available for credit at planned retirement date.
- 247 projected unused sick days less 122 actual unused sick days available = 125 additional sick days x \$110 = \$13,750.

Adjustment for Unreimbursed Continuing Education Costs

As of July 1, 2000, Act 48 requires persons holding Pennsylvania educator certification to complete continuing education requirements every five years in order to maintain their certificates as active. The School District's contract with HCEA indicates that the costs of obtaining these credits will be paid by the school district, subject to certain limitations. To maintain his educator certification, Mr. Sidelinger obtained these credits and paid for them personally at a cost of \$2,476.27. It is reasonable to conclude that these expenses would have been reimbursed had Mr. Sidelinger remained employed by the School District.

Adjustment for Negative Tax Consequences

We have been asked to make an adjustment to our damage calculation to account for the negative tax consequences associated with receiving the front and back pay in a single tax year, rather than being spread out over time. Mr. Sidelinger would have earned the back pay and front pay had he not been allegedly wrongfully terminated by the Defendant. Therefore, Mr. Sidelinger should be entitled to receive the value of the front pay and back pay that he would have received over his work life. That value is diminished when the lump sum is taxed at a higher level. Therefore, in order for Mr. Sidelinger to be made whole, he should be entitled to an award of the negative tax consequences on the back pay and front pay portion of the damages.

Assuming that Mr. Sidelinger had received his scheduled but for teaching salary, his 2005 federal taxable earnings from teaching would have been approximately \$56,425. Assuming his remaining income and deductions would approximate the 2004 amounts (with the exception of the farming/roofing activities, which we have estimated at breakeven rather than a loss), Mr. Sidelinger's 2005 effective federal tax rate would be approximately 14.036%. Using an effective federal tax rate of 14.036%, Mr. Sidelinger would owe approximately \$158,600 in federal taxes on the taxable portion of the lost teaching wages, which total \$1,129,948. The taxable portion of the lost teaching wages of \$1,129,948.46 consists of back pay in the amount of \$280,384.09 (\$299,067.62 gross less employee PSERS contributions of \$18,683.53 = \$280,384.09) and front pay in the amount of \$849,564.37 (\$908,625.00 gross less 6.5% PSERS employee contribution of

Paul J. Susko, Esquire
 August 31, 2005
 Page 10

\$59,060.63 = \$849,564.37). However, because Mr. Sidelinger would be receiving these wages all at once in a lump sum amount, he would be taxed at a higher marginal tax rate. Using the same deductions, the effective federal tax rate increases to 33.697%. Applying an effective federal tax rate of 33.697% to the taxable portion of the front and back pay recovery of \$1,129,948 results in a tax liability of \$380,759. This amount is **\$222,159** (\$380,759 less \$158,600 = \$222,159) more in taxes than Mr. Sidelinger would have owed on this money had he received it over time as annual wages. In addition, the Pennsylvania state income tax rate increased by 0.27% from 2.80% to 3.07% effective January 1, 2004. As a result, Mr. Sidelinger would incur additional state income taxes in the amount of **\$489** on the wages earned from the date of termination through December 31, 2003 (\$181,100.62 back pay from date of determination through December 31, 2003 x .0027 differential in state income tax rate = \$488.98). Therefore, an adjustment should be made in the amount of **\$222,648** to account for the negative tax consequences associated with receiving economic damages in a lump sum amount.

If the Court determines that Mr. Sidelinger's economic damages are limited to back pay only, the effective federal tax rate on the taxable lump sum back pay of \$280,384.09 (\$299,067.62 less employee PSERS employee contributions of \$18,683.53 = \$280,384.09) would amount to 29.75%. Applying this rate to the taxable portion of the back pay recovery results in a federal tax liability of \$83,414 (\$280,384 x 29.75%), which is \$44,059 higher than the federal tax of \$39,355 calculated using Mr. Sidelinger's normal effective federal rate of 14.036% (\$280,384 x 14.036% = \$39,355). Therefore, should the Court decide that Mr. Sidelinger is entitled to a lump sum economic damage award for back pay only, we believe that an adjustment should be made in the amount of **\$44,059** to account for the negative federal tax consequences of receiving the back pay in a lump sum. In addition, he would be entitled to the additional **\$489** in state taxes incurred as a result of the increase in the Pennsylvania state income tax rate effective January 1, 2004 to arrive at a total adjustment of **\$44,548**.

Adjustment for Prejudgment Interest

The purpose of an award for prejudgment interest is to reimburse the claimant for the loss of the use of its investment or its funds from the time of the loss until judgment is entered. The decision to award prejudgment interest and the amount of interest awarded are usually within the trial court's discretion. We, however, have been asked to provide a calculation for the Prejudgment Interest on the back pay damages through date of the trial. It is our understanding that the trial is to occur during the month of September 2005. For purposes of this report, we have calculated prejudgment interest through September 1, 2005.

For purposes of this calculation, we have utilized the post-judgment interest rate statute, 28 U.S.C. Code Section 1961(a). According to this statute, interest is to be calculated at a rate equal to the coupon issue yield equivalent (as determined by the Secretary of the Treasury) of the average accepted auction price for the last auction of the fifty-two week United States Treasury bills settled immediately prior to the date of the judgment. This 52-week Treasury bill rate has been found by Congress and by the marketplace to be a

Paul J. Susko, Esquire
 August 31, 2005
 Page 11

suitable approximation of the available return for a typical risk-free investment. The Treasury, however, discontinued the auction of the 52-week Treasury bills at the end of February, 2001. The current applicable rate to use is the U.S. Government Securities – Treasury Constant Maturities – 1 year which can be found on the Federal Reserve's website at <http://www.federalreserve.gov/releases/H15/data/wf/tcm1.y.txt>.

We have calculated the pre-judgment interest on the back pay (net of employee PSERS contributions) to amount to **\$15,386.80** as detailed at **Exhibit 10**.

According to the PSERS Active Member Handbook, PSERS employee contributions are, by law, credited with 4% interest annually. Therefore, we believe this would be the appropriate interest rate to use for purposes of calculating the prejudgment interest on the portion of the back pay that would have been contributed to the PSERS retirement account. This prejudgment interest amounts to **\$1,897.15** as detailed at **Exhibit 11**.

Summary and Conclusions

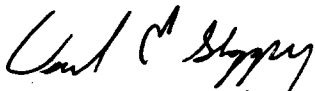
The past and future economic loss incurred by Mr. Sidelinger as a result of the alleged actions of the Harbor Creek School District which led to a loss of wages and reduced retirement benefits. These damages amount to the following, dependent upon which option is selected under the PSERS retirement system:

	<u>Total</u>	<u>Reference</u>
Assuming PSERS Maximum Single Life Annuity selected	\$ 1,795,041.48	Exhibit 12
Assuming PSERS Option 2 selected	\$ 2,018,564.41	Exhibit 13
Assuming PSERS Option 3 selected	\$ 1,918,947.31	Exhibit 14
Assuming Damages limited to back pay only	\$ 412,541.40	Exhibit 15

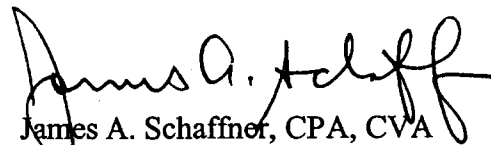
The damage calculations contained in this report have been prepared to a reasonable degree of professional certainty.

We reserve the right to update this report if additional information is received that would impact our calculations.

Sincerely,



Daniel E. Sloppy, CPA, CVA



James A. Schaffner, CPA, CVA
 Principal

DES-JAS/tlh

Exhibit 1
David E. Sidelinger
Projected But For Wages

From	To	Projected Salary	Actual Salary	Difference
9/1/1999	8/31/2000	\$ 52,250.00	\$ 36,237.38	\$ 16,012.62
9/1/2000	8/31/2001	53,348.00	-	53,348.00
9/1/2001	8/31/2002	55,014.00	-	55,014.00
9/1/2002	8/31/2003	56,726.00	-	56,726.00
9/1/2003	8/31/2004	58,073.00	-	58,073.00
9/1/2004	8/31/2005	59,894.00	-	59,894.00
Total Past Wages		\$ 335,305.00	36,237.38	\$ 299,067.62
9/1/2005	8/31/2006	60,575.00	-	60,575.00
9/1/2006	8/31/2007	60,575.00	-	60,575.00
9/1/2007	8/31/2008	60,575.00	-	60,575.00
9/1/2008	8/31/2009	60,575.00	-	60,575.00
9/1/2009	8/31/2010	60,575.00	-	60,575.00
9/1/2010	8/31/2011	60,575.00	-	60,575.00
9/1/2011	8/31/2012	60,575.00	-	60,575.00
9/1/2012	8/31/2013	60,575.00	-	60,575.00
9/1/2013	8/31/2014	60,575.00	-	60,575.00
9/1/2014	8/31/2015	60,575.00	-	60,575.00
9/1/2015	8/31/2016	60,575.00	-	60,575.00
9/1/2016	8/31/2017	60,575.00	-	60,575.00
9/1/2017	8/31/2018	60,575.00	-	60,575.00
9/1/2018	8/31/2019	60,575.00	-	60,575.00
9/1/2019	8/31/2020	60,575.00	-	60,575.00
Total Projected Future Wages		\$ 908,625.00	-	\$ 908,625.00
Total Past and Projected Future Lost Wages				<u>\$ 1,207,692.62</u>

EXHIBIT 2



Retirement Estimate

This estimate was performed on August 24, 2005, and was based on the following data:

Member Information

Gender: Male	Retirement Type: Normal
Birth Date: 08/19/1952	Age: 53 Yrs. 0 Mos.
Retirement Date: 08/19/2014	Age at Retirement: 62 Yrs. 0 Mos.
Final Average Salary: \$51,353.00	Member Contributions: \$32,473.31
Class T-D Service: 19.72	Member Interest: \$19,769.82
Class T-C Service: 0.00	Non-withdrawable Contributions: \$0.00
Total Service: 19.72	Purchase of Service Debt: \$0.00

Survivor Annuitant Information

Gender: Female	Birth Date: 10/01/1958
-----------------------	-------------------------------

(The following calculation is based on the membership class you elected. Class T-C membership calculates all service using a basic retirement benefit calculation multiplier of 2.0%. Class T-D membership calculates all service using a basic retirement benefit calculation multiplier of 2.5% applied to all Pennsylvania public school service and intervening military service. All other service of a Class T-D member is calculated using the 2.0% multiplier.)

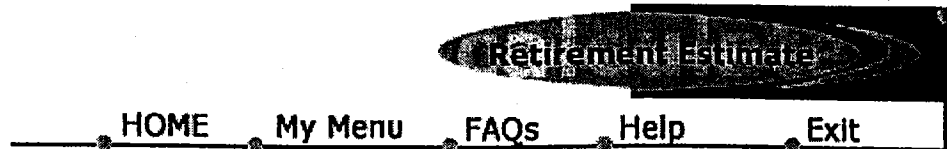
Membership Calculation				
Option	Withdrawing No Money		Withdrawing All of Your Money	
	Yearly	Monthly	Yearly	Monthly
Maximum	\$25,317	\$2,110	\$21,812	\$1,818
Option 1	\$23,770	\$1,981	\$20,466	\$1,705
Option 2	\$21,320	\$1,777	\$18,318	\$1,527
Option 3	\$23,127	\$1,927	\$19,894	\$1,658

Death Benefit for Option 1 (withdrawing no money): \$371,894

[Another Estimate](#)

| [Home](#) | [My Menu](#) | [To FAQ](#) | [Help](#) | [Exit](#) |

EXHIBIT 3



Retirement Estimate

This estimate was performed on August 31, 2005, and was based on the following data:

Member Information

Gender: Male	Retirement Type: Normal
Birth Date: 08/19/1952	Age: 53 Yrs. 0 Mos.
Retirement Date: 08/31/2020	Age at Retirement: 68 Yrs. 0 Mos.
Final Average Salary: \$60,575.00	Member Contributions: \$32,473.31
Class T-D Service: 40.00	Member Interest: \$19,769.82
Class T-C Service: 0.00	Non-withdrawable Contributions: \$0.00
Total Service: 40.00	Purchase of Service Debt: \$0.00

Survivor Annuitant Information

Gender: Female	Birth Date: 10/01/1958
-----------------------	-------------------------------

(The following calculation is based on the membership class you elected. Class T-C membership calculates all service using a basic retirement benefit calculation multiplier of 2.0%. Class T-D membership calculates all service using a basic retirement benefit calculation multiplier of 2.5% applied to all Pennsylvania public school service and intervening military service. All other service of a Class T-D member is calculated using the 2.0% multiplier.)

Membership Calculation				
Option	Withdrawing No Money		Withdrawing All of Your Money	
	Yearly	Monthly	Yearly	Monthly
Maximum	\$60,575	\$5,048	\$56,459	\$4,705
Option 1	\$54,524	\$4,544	\$50,814	\$4,235
Option 2	\$49,497	\$4,125	\$46,116	\$3,843
Option 3	\$54,440	\$4,537	\$50,730	\$4,227

Death Benefit for Option 1 (withdrawing no money): \$765,515

[Another Estimate](#)

| [Home](#) | [My Menu](#) | [To FAQ](#) | [Help](#) | [Exit](#) |

Exhibit 4													
David E. Sidelinger													
Projected Actual PSERS Pension (Maximum Single Life Annuity)													
Year	January	February	March	April	May	June	July	August	September	October	November	December	Total
2014	-	-	-	-	-	-	-	2,109.76	2,109.76	2,109.76	2,109.76	2,109.76	10,548.80
2015	2,109.76	2,109.76	2,109.76	2,109.76	2,109.76	2,109.76	2,109.76	2,109.76	2,109.76	2,109.76	2,109.76	2,109.76	25,317.12
2016	2,109.76	2,109.76	2,109.76	2,109.76	2,109.76	2,109.76	2,109.76	2,109.76	2,109.76	2,109.76	2,109.76	2,109.76	25,317.12
2017	2,109.76	2,109.76	2,109.76	2,109.76	2,109.76	2,109.76	2,109.76	2,109.76	2,109.76	2,109.76	2,109.76	2,109.76	25,317.12
2018	2,109.76	2,109.76	2,109.76	2,109.76	2,109.76	2,109.76	2,109.76	2,109.76	2,109.76	2,109.76	2,109.76	2,109.76	25,317.12
2019	2,109.76	2,109.76	2,109.76	2,109.76	2,109.76	2,109.76	2,109.76	2,109.76	2,109.76	2,109.76	2,109.76	2,109.76	25,317.12
2020	2,109.76	2,109.76	2,109.76	2,109.76	2,109.76	2,109.76	2,109.76	2,109.76	2,109.76	2,109.76	2,109.76	2,109.76	25,317.12
2021	2,109.76	2,109.76	2,109.76	2,109.76	2,109.76	2,109.76	2,109.76	2,109.76	2,109.76	2,109.76	2,109.76	2,109.76	25,317.12
2022	2,109.76	2,109.76	2,109.76	2,109.76	2,109.76	2,109.76	2,109.76	2,109.76	2,109.76	2,109.76	2,109.76	2,109.76	25,317.12
2023	2,109.76	2,109.76	2,109.76	2,109.76	2,109.76	2,109.76	2,109.76	2,109.76	2,109.76	2,109.76	2,109.76	2,109.76	25,317.12
2024	2,109.76	2,109.76	2,109.76	2,109.76	2,109.76	2,109.76	2,109.76	2,109.76	2,109.76	2,109.76	2,109.76	2,109.76	25,317.12
2025	2,109.76	2,109.76	2,109.76	2,109.76	2,109.76	2,109.76	2,109.76	2,109.76	2,109.76	2,109.76	2,109.76	2,109.76	25,317.12
2026	2,109.76	2,109.76	2,109.76	2,109.76	2,109.76	2,109.76	2,109.76	2,109.76	2,109.76	2,109.76	2,109.76	2,109.76	25,317.12
2027	2,109.76	2,109.76	2,109.76	2,109.76	2,109.76	2,109.76	2,109.76	2,109.76	2,109.76	2,109.76	2,109.76	2,109.76	25,317.12
2028	2,109.76	2,109.76	2,109.76	2,109.76	2,109.76	2,109.76	2,109.76	2,109.76	2,109.76	2,109.76	2,109.76	2,109.76	25,317.12
2029	2,109.76	2,109.76	2,109.76	2,109.76	2,109.76	2,109.76	2,109.76	2,109.76	2,109.76	2,109.76	2,109.76	2,109.76	25,317.12
2030	2,109.76	2,109.76	2,109.76	2,109.76	2,109.76	2,109.76	2,109.76	2,109.76	2,109.76	2,109.76	2,109.76	2,109.76	25,317.12
2031	-	-	-	-	-	-	-	-	-	-	-	-	-
2032	-	-	-	-	-	-	-	-	-	-	-	-	-
2033	-	-	-	-	-	-	-	-	-	-	-	-	-
2034	-	-	-	-	-	-	-	-	-	-	-	-	-
2035	-	-	-	-	-	-	-	-	-	-	-	-	-
2036	-	-	-	-	-	-	-	-	-	-	-	-	-
2037	-	-	-	-	-	-	-	-	-	-	-	-	-
2038	-	-	-	-	-	-	-	-	-	-	-	-	-
2039	-	-	-	-	-	-	-	-	-	-	-	-	-
2040	-	-	-	-	-	-	-	-	-	-	-	-	-
Total Projected Actual PSERS Retirement Benefits (Maximum Single Life Annuity)													\$415,622.72

Exhibit 6													
David E. Sidelinger													
Projected Actual PSERS Pension (Option 2 - Same Benefit Paid to Spouse Upon Participant's Death)													
Year	January	February	March	April	May	June	July	August	September	October	November	December	Total
2014	-	-	-	-	-	-	-	1,776.67	1,776.67	1,776.67	1,776.67	1,776.67	8,883.36
2015	1,776.67	1,776.67	1,776.67	1,776.67	1,776.67	1,776.67	1,776.67	1,776.67	1,776.67	1,776.67	1,776.67	1,776.67	21,320.04
2016	1,776.67	1,776.67	1,776.67	1,776.67	1,776.67	1,776.67	1,776.67	1,776.67	1,776.67	1,776.67	1,776.67	1,776.67	21,320.04
2017	1,776.67	1,776.67	1,776.67	1,776.67	1,776.67	1,776.67	1,776.67	1,776.67	1,776.67	1,776.67	1,776.67	1,776.67	21,320.04
2018	1,776.67	1,776.67	1,776.67	1,776.67	1,776.67	1,776.67	1,776.67	1,776.67	1,776.67	1,776.67	1,776.67	1,776.67	21,320.04
2019	1,776.67	1,776.67	1,776.67	1,776.67	1,776.67	1,776.67	1,776.67	1,776.67	1,776.67	1,776.67	1,776.67	1,776.67	21,320.04
2020	1,776.67	1,776.67	1,776.67	1,776.67	1,776.67	1,776.67	1,776.67	1,776.67	1,776.67	1,776.67	1,776.67	1,776.67	21,320.04
2021	1,776.67	1,776.67	1,776.67	1,776.67	1,776.67	1,776.67	1,776.67	1,776.67	1,776.67	1,776.67	1,776.67	1,776.67	21,320.04
2022	1,776.67	1,776.67	1,776.67	1,776.67	1,776.67	1,776.67	1,776.67	1,776.67	1,776.67	1,776.67	1,776.67	1,776.67	21,320.04
2023	1,776.67	1,776.67	1,776.67	1,776.67	1,776.67	1,776.67	1,776.67	1,776.67	1,776.67	1,776.67	1,776.67	1,776.67	21,320.04
2024	1,776.67	1,776.67	1,776.67	1,776.67	1,776.67	1,776.67	1,776.67	1,776.67	1,776.67	1,776.67	1,776.67	1,776.67	21,320.04
2025	1,776.67	1,776.67	1,776.67	1,776.67	1,776.67	1,776.67	1,776.67	1,776.67	1,776.67	1,776.67	1,776.67	1,776.67	21,320.04
2026	1,776.67	1,776.67	1,776.67	1,776.67	1,776.67	1,776.67	1,776.67	1,776.67	1,776.67	1,776.67	1,776.67	1,776.67	21,320.04
2027	1,776.67	1,776.67	1,776.67	1,776.67	1,776.67	1,776.67	1,776.67	1,776.67	1,776.67	1,776.67	1,776.67	1,776.67	21,320.04
2028	1,776.67	1,776.67	1,776.67	1,776.67	1,776.67	1,776.67	1,776.67	1,776.67	1,776.67	1,776.67	1,776.67	1,776.67	21,320.04
2029	1,776.67	1,776.67	1,776.67	1,776.67	1,776.67	1,776.67	1,776.67	1,776.67	1,776.67	1,776.67	1,776.67	1,776.67	21,320.04
2030	1,776.67	1,776.67	1,776.67	1,776.67	1,776.67	1,776.67	1,776.67	1,776.67	1,776.67	1,776.67	1,776.67	1,776.67	21,320.04
2031	1,776.67	1,776.67	1,776.67	1,776.67	1,776.67	1,776.67	1,776.67	1,776.67	1,776.67	1,776.67	1,776.67	1,776.67	21,320.04
2032	1,776.67	1,776.67	1,776.67	1,776.67	1,776.67	1,776.67	1,776.67	1,776.67	1,776.67	1,776.67	1,776.67	1,776.67	21,320.04
2033	1,776.67	1,776.67	1,776.67	1,776.67	1,776.67	1,776.67	1,776.67	1,776.67	1,776.67	1,776.67	1,776.67	1,776.67	21,320.04
2034	1,776.67	1,776.67	1,776.67	1,776.67	1,776.67	1,776.67	1,776.67	1,776.67	1,776.67	1,776.67	1,776.67	1,776.67	21,320.04
2035	1,776.67	1,776.67	1,776.67	1,776.67	1,776.67	1,776.67	1,776.67	1,776.67	1,776.67	1,776.67	1,776.67	1,776.67	21,320.04
2036	1,776.67	1,776.67	1,776.67	1,776.67	1,776.67	1,776.67	1,776.67	1,776.67	1,776.67	1,776.67	1,776.67	1,776.67	21,320.04
2037	1,776.67	1,776.67	1,776.67	1,776.67	1,776.67	1,776.67	1,776.67	1,776.67	1,776.67	1,776.67	1,776.67	1,776.67	21,320.04
2038	1,776.67	1,776.67	1,776.67	1,776.67	1,776.67	1,776.67	1,776.67	1,776.67	1,776.67	1,776.67	1,776.67	1,776.67	21,320.04
2039	1,776.67	1,776.67	1,776.67	1,776.67	1,776.67	1,776.67	1,776.67	1,776.67	1,776.67	1,776.67	1,776.67	1,776.67	21,320.04
2040	1,776.67	1,776.67	1,776.67	1,776.67	1,776.67	1,776.67	1,776.67	1,776.67	-	-	-	-	14,213.36
Total Projected Actual PSERS Retirement Benefits (Option 2)													\$566,097.71

Exhibit 6													
David E. Sidelinger													
Projected Actual PSERS Pension (Option 3 - One-Half of Monthly Benefit Paid to Spouse Upon Participant's Death)													
Year	January	February	March	April	May	June	July	August	September	October	November	December	Total
2014	-	-	-	-	-	-	-	1,927.25	1,927.25	1,927.25	1,927.25	1,927.25	9,836.25
2015	1,927.25	1,927.25	1,927.25	1,927.25	1,927.25	1,927.25	1,927.25	1,927.25	1,927.25	1,927.25	1,927.25	1,927.25	23,127.00
2016	1,927.25	1,927.25	1,927.25	1,927.25	1,927.25	1,927.25	1,927.25	1,927.25	1,927.25	1,927.25	1,927.25	1,927.25	23,127.00
2017	1,927.25	1,927.25	1,927.25	1,927.25	1,927.25	1,927.25	1,927.25	1,927.25	1,927.25	1,927.25	1,927.25	1,927.25	23,127.00
2018	1,927.25	1,927.25	1,927.25	1,927.25	1,927.25	1,927.25	1,927.25	1,927.25	1,927.25	1,927.25	1,927.25	1,927.25	23,127.00
2019	1,927.25	1,927.25	1,927.25	1,927.25	1,927.25	1,927.25	1,927.25	1,927.25	1,927.25	1,927.25	1,927.25	1,927.25	23,127.00
2020	1,927.25	1,927.25	1,927.25	1,927.25	1,927.25	1,927.25	1,927.25	1,927.25	1,927.25	1,927.25	1,927.25	1,927.25	23,127.00
2021	1,927.25	1,927.25	1,927.25	1,927.25	1,927.25	1,927.25	1,927.25	1,927.25	1,927.25	1,927.25	1,927.25	1,927.25	23,127.00
2022	1,927.25	1,927.25	1,927.25	1,927.25	1,927.25	1,927.25	1,927.25	1,927.25	1,927.25	1,927.25	1,927.25	1,927.25	23,127.00
2023	1,927.25	1,927.25	1,927.25	1,927.25	1,927.25	1,927.25	1,927.25	1,927.25	1,927.25	1,927.25	1,927.25	1,927.25	23,127.00
2024	1,927.25	1,927.25	1,927.25	1,927.25	1,927.25	1,927.25	1,927.25	1,927.25	1,927.25	1,927.25	1,927.25	1,927.25	23,127.00
2025	1,927.25	1,927.25	1,927.25	1,927.25	1,927.25	1,927.25	1,927.25	1,927.25	1,927.25	1,927.25	1,927.25	1,927.25	23,127.00
2026	1,927.25	1,927.25	1,927.25	1,927.25	1,927.25	1,927.25	1,927.25	1,927.25	1,927.25	1,927.25	1,927.25	1,927.25	23,127.00
2027	1,927.25	1,927.25	1,927.25	1,927.25	1,927.25	1,927.25	1,927.25	1,927.25	1,927.25	1,927.25	1,927.25	1,927.25	23,127.00
2028	1,927.25	1,927.25	1,927.25	1,927.25	1,927.25	1,927.25	1,927.25	1,927.25	1,927.25	1,927.25	1,927.25	1,927.25	23,127.00
2029	1,927.25	1,927.25	1,927.25	1,927.25	1,927.25	1,927.25	1,927.25	1,927.25	1,927.25	1,927.25	1,927.25	1,927.25	23,127.00
2030	1,927.25	1,927.25	1,927.25	1,927.25	1,927.25	1,927.25	1,927.25	1,927.25	1,927.25	1,927.25	1,927.25	1,927.25	23,127.00
2031	963.63	963.63	963.63	963.63	963.63	963.63	963.63	963.63	963.63	963.63	963.63	963.63	11,563.60
2032	963.63	963.63	963.63	963.63	963.63	963.63	963.63	963.63	963.63	963.63	963.63	963.63	11,563.60
2033	963.63	963.63	963.63	963.63	963.63	963.63	963.63	963.63	963.63	963.63	963.63	963.63	11,563.60
2034	963.63	963.63	963.63	963.63	963.63	963.63	963.63	963.63	963.63	963.63	963.63	963.63	11,563.60
2035	963.63	963.63	963.63	963.63	963.63	963.63	963.63	963.63	963.63	963.63	963.63	963.63	11,563.60
2036	963.63	963.63	963.63	963.63	963.63	963.63	963.63	963.63	963.63	963.63	963.63	963.63	11,563.60
2037	963.63	963.63	963.63	963.63	963.63	963.63	963.63	963.63	963.63	963.63	963.63	963.63	11,563.60
2038	963.63	963.63	963.63	963.63	963.63	963.63	963.63	963.63	963.63	963.63	963.63	963.63	11,563.60
2039	963.63	963.63	963.63	963.63	963.63	963.63	963.63	963.63	963.63	963.63	963.63	963.63	11,563.60
2040	963.63	963.63	963.63	963.63	963.63	963.63	963.63	963.63	-	-	-	-	7,709.00
Total Projected Actual PSERS Retirement Benefits (Option 3)													\$491,448.78

Exhibit 7													
David E. Sidelinger													
Projected But For PSERS Pension (Maximum Single Life Annuity)													
	January	February	March	April	May	June	July	August	September	October	November	December	Total
2013	-	-	-	-	-	-	-	-	-	-	-	-	-
2014	-	-	-	-	-	-	-	-	-	-	-	-	-
2015	-	-	-	-	-	-	-	-	-	-	-	-	-
2016	-	-	-	-	-	-	-	-	-	-	-	-	-
2017	-	-	-	-	-	-	-	-	-	-	-	-	-
2018	-	-	-	-	-	-	-	-	-	-	-	-	-
2019	-	-	-	-	-	-	-	-	-	-	-	-	-
2020	-	-	-	-	-	-	-	-	5,047.92	5,047.92	5,047.92	5,047.92	20,191.68
2021	5,047.92	5,047.92	5,047.92	5,047.92	5,047.92	5,047.92	5,047.92	5,047.92	5,047.92	5,047.92	5,047.92	5,047.92	60,575.04
2022	5,047.92	5,047.92	5,047.92	5,047.92	5,047.92	5,047.92	5,047.92	5,047.92	5,047.92	5,047.92	5,047.92	5,047.92	60,575.04
2023	5,047.92	5,047.92	5,047.92	5,047.92	5,047.92	5,047.92	5,047.92	5,047.92	5,047.92	5,047.92	5,047.92	5,047.92	60,575.04
2024	5,047.92	5,047.92	5,047.92	5,047.92	5,047.92	5,047.92	5,047.92	5,047.92	5,047.92	5,047.92	5,047.92	5,047.92	60,575.04
2025	5,047.92	5,047.92	5,047.92	5,047.92	5,047.92	5,047.92	5,047.92	5,047.92	5,047.92	5,047.92	5,047.92	5,047.92	60,575.04
2026	5,047.92	5,047.92	5,047.92	5,047.92	5,047.92	5,047.92	5,047.92	5,047.92	5,047.92	5,047.92	5,047.92	5,047.92	60,575.04
2027	5,047.92	5,047.92	5,047.92	5,047.92	5,047.92	5,047.92	5,047.92	5,047.92	5,047.92	5,047.92	5,047.92	5,047.92	60,575.04
2028	5,047.92	5,047.92	5,047.92	5,047.92	5,047.92	5,047.92	5,047.92	5,047.92	5,047.92	5,047.92	5,047.92	5,047.92	60,575.04
2029	5,047.92	5,047.92	5,047.92	5,047.92	5,047.92	5,047.92	5,047.92	5,047.92	5,047.92	5,047.92	5,047.92	5,047.92	60,575.04
2030	5,047.92	5,047.92	5,047.92	5,047.92	5,047.92	5,047.92	5,047.92	5,047.92	5,047.92	5,047.92	5,047.92	5,047.92	60,575.04
2031	-	-	-	-	-	-	-	-	-	-	-	-	-
2032	-	-	-	-	-	-	-	-	-	-	-	-	-
2033	-	-	-	-	-	-	-	-	-	-	-	-	-
2034	-	-	-	-	-	-	-	-	-	-	-	-	-
2035	-	-	-	-	-	-	-	-	-	-	-	-	-
2036	-	-	-	-	-	-	-	-	-	-	-	-	-
2037	-	-	-	-	-	-	-	-	-	-	-	-	-
2038	-	-	-	-	-	-	-	-	-	-	-	-	-
2039	-	-	-	-	-	-	-	-	-	-	-	-	-
2040	-	-	-	-	-	-	-	-	-	-	-	-	-
Total Projected But For PSERS Retirement Benefits (Maximum Single Life Annuity)													\$ 626,942.08

Exhibit 8													
David E. Sidelinger													
Projected But For PSERS Pension (Option 2 - Same Benefit Paid to Spouse Upon Participant's Death)													
	January	February	March	April	May	June	July	August	September	October	November	December	Total
2013	-	-	-	-	-	-	-	-	-	-	-	-	-
2014	-	-	-	-	-	-	-	-	-	-	-	-	-
2015	-	-	-	-	-	-	-	-	-	-	-	-	-
2016	-	-	-	-	-	-	-	-	-	-	-	-	-
2017	-	-	-	-	-	-	-	-	-	-	-	-	-
2018	-	-	-	-	-	-	-	-	-	-	-	-	-
2019	-	-	-	-	-	-	-	-	-	-	-	-	-
2020	-	-	-	-	-	-	-	-	4,124.75	4,124.75	4,124.75	4,124.75	16,499.00
2021	4,124.75	4,124.75	4,124.75	4,124.75	4,124.75	4,124.75	4,124.75	4,124.75	4,124.75	4,124.75	4,124.75	4,124.75	49,497.00
2022	4,124.75	4,124.75	4,124.75	4,124.75	4,124.75	4,124.75	4,124.75	4,124.75	4,124.75	4,124.75	4,124.75	4,124.75	49,497.00
2023	4,124.75	4,124.75	4,124.75	4,124.75	4,124.75	4,124.75	4,124.75	4,124.75	4,124.75	4,124.75	4,124.75	4,124.75	49,497.00
2024	4,124.75	4,124.75	4,124.75	4,124.75	4,124.75	4,124.75	4,124.75	4,124.75	4,124.75	4,124.75	4,124.75	4,124.75	49,497.00
2025	4,124.75	4,124.75	4,124.75	4,124.75	4,124.75	4,124.75	4,124.75	4,124.75	4,124.75	4,124.75	4,124.75	4,124.75	49,497.00
2026	4,124.75	4,124.75	4,124.75	4,124.75	4,124.75	4,124.75	4,124.75	4,124.75	4,124.75	4,124.75	4,124.75	4,124.75	49,497.00
2027	4,124.75	4,124.75	4,124.75	4,124.75	4,124.75	4,124.75	4,124.75	4,124.75	4,124.75	4,124.75	4,124.75	4,124.75	49,497.00
2028	4,124.75	4,124.75	4,124.75	4,124.75	4,124.75	4,124.75	4,124.75	4,124.75	4,124.75	4,124.75	4,124.75	4,124.75	49,497.00
2029	4,124.75	4,124.75	4,124.75	4,124.75	4,124.75	4,124.75	4,124.75	4,124.75	4,124.75	4,124.75	4,124.75	4,124.75	49,497.00
2030	4,124.75	4,124.75	4,124.75	4,124.75	4,124.75	4,124.75	4,124.75	4,124.75	4,124.75	4,124.75	4,124.75	4,124.75	49,497.00
2031	4,124.75	4,124.75	4,124.75	4,124.75	4,124.75	4,124.75	4,124.75	4,124.75	4,124.75	4,124.75	4,124.75	4,124.75	49,497.00
2032	4,124.75	4,124.75	4,124.75	4,124.75	4,124.75	4,124.75	4,124.75	4,124.75	4,124.75	4,124.75	4,124.75	4,124.75	49,497.00
2033	4,124.75	4,124.75	4,124.75	4,124.75	4,124.75	4,124.75	4,124.75	4,124.75	4,124.75	4,124.75	4,124.75	4,124.75	49,497.00
2034	4,124.75	4,124.75	4,124.75	4,124.75	4,124.75	4,124.75	4,124.75	4,124.75	4,124.75	4,124.75	4,124.75	4,124.75	49,497.00
2035	4,124.75	4,124.75	4,124.75	4,124.75	4,124.75	4,124.75	4,124.75	4,124.75	4,124.75	4,124.75	4,124.75	4,124.75	49,497.00
2036	4,124.75	4,124.75	4,124.75	4,124.75	4,124.75	4,124.75	4,124.75	4,124.75	4,124.75	4,124.75	4,124.75	4,124.75	49,497.00
2037	4,124.75	4,124.75	4,124.75	4,124.75	4,124.75	4,124.75	4,124.75	4,124.75	4,124.75	4,124.75	4,124.75	4,124.75	49,497.00
2038	4,124.75	4,124.75	4,124.75	4,124.75	4,124.75	4,124.75	4,124.75	4,124.75	4,124.75	4,124.75	4,124.75	4,124.75	49,497.00
2039	4,124.75	4,124.75	4,124.75	4,124.75	4,124.75	4,124.75	4,124.75	4,124.75	4,124.75	4,124.75	4,124.75	4,124.75	49,497.00
2040	4,124.75	4,124.75	4,124.75	4,124.75	4,124.75	4,124.75	4,124.75	4,124.75	-	-	-	-	32,998.00
Total Projected But For PSERS Retirement Benefits (Option 2)													
													\$ 989,940.00

Exhibit 9													
David E. Sidelinger													
Projected But For PSERS Pension (Option 3 - One-half of Monthly Benefit Paid to Spouse Upon Participant's Death)													
	January	February	March	April	May	June	July	August	September	October	November	December	Total
2013	-	-	-	-	-	-	-	-	-	-	-	-	-
2014	-	-	-	-	-	-	-	-	-	-	-	-	-
2015	-	-	-	-	-	-	-	-	-	-	-	-	-
2016	-	-	-	-	-	-	-	-	-	-	-	-	-
2017	-	-	-	-	-	-	-	-	-	-	-	-	-
2018	-	-	-	-	-	-	-	-	-	-	-	-	-
2019	-	-	-	-	-	-	-	-	-	-	-	-	-
2020	-	-	-	-	-	-	-	-	4,536.67	4,536.67	4,536.67	4,536.67	18,146.68
2021	4,536.67	4,536.67	4,536.67	4,536.67	4,536.67	4,536.67	4,536.67	4,536.67	4,536.67	4,536.67	4,536.67	4,536.67	54,440.04
2022	4,536.67	4,536.67	4,536.67	4,536.67	4,536.67	4,536.67	4,536.67	4,536.67	4,536.67	4,536.67	4,536.67	4,536.67	54,440.04
2023	4,536.67	4,536.67	4,536.67	4,536.67	4,536.67	4,536.67	4,536.67	4,536.67	4,536.67	4,536.67	4,536.67	4,536.67	54,440.04
2024	4,536.67	4,536.67	4,536.67	4,536.67	4,536.67	4,536.67	4,536.67	4,536.67	4,536.67	4,536.67	4,536.67	4,536.67	54,440.04
2025	4,536.67	4,536.67	4,536.67	4,536.67	4,536.67	4,536.67	4,536.67	4,536.67	4,536.67	4,536.67	4,536.67	4,536.67	54,440.04
2026	4,536.67	4,536.67	4,536.67	4,536.67	4,536.67	4,536.67	4,536.67	4,536.67	4,536.67	4,536.67	4,536.67	4,536.67	54,440.04
2027	4,536.67	4,536.67	4,536.67	4,536.67	4,536.67	4,536.67	4,536.67	4,536.67	4,536.67	4,536.67	4,536.67	4,536.67	54,440.04
2028	4,536.67	4,536.67	4,536.67	4,536.67	4,536.67	4,536.67	4,536.67	4,536.67	4,536.67	4,536.67	4,536.67	4,536.67	54,440.04
2029	4,536.67	4,536.67	4,536.67	4,536.67	4,536.67	4,536.67	4,536.67	4,536.67	4,536.67	4,536.67	4,536.67	4,536.67	54,440.04
2030	4,536.67	4,536.67	4,536.67	4,536.67	4,536.67	4,536.67	4,536.67	4,536.67	4,536.67	4,536.67	4,536.67	4,536.67	54,440.04
2031	2,268.34	2,268.34	2,268.34	2,268.34	2,268.34	2,268.34	2,268.34	2,268.34	2,268.34	2,268.34	2,268.34	2,268.34	27,220.02
2032	2,268.34	2,268.34	2,268.34	2,268.34	2,268.34	2,268.34	2,268.34	2,268.34	2,268.34	2,268.34	2,268.34	2,268.34	27,220.02
2033	2,268.34	2,268.34	2,268.34	2,268.34	2,268.34	2,268.34	2,268.34	2,268.34	2,268.34	2,268.34	2,268.34	2,268.34	27,220.02
2034	2,268.34	2,268.34	2,268.34	2,268.34	2,268.34	2,268.34	2,268.34	2,268.34	2,268.34	2,268.34	2,268.34	2,268.34	27,220.02
2035	2,268.34	2,268.34	2,268.34	2,268.34	2,268.34	2,268.34	2,268.34	2,268.34	2,268.34	2,268.34	2,268.34	2,268.34	27,220.02
2036	2,268.34	2,268.34	2,268.34	2,268.34	2,268.34	2,268.34	2,268.34	2,268.34	2,268.34	2,268.34	2,268.34	2,268.34	27,220.02
2037	2,268.34	2,268.34	2,268.34	2,268.34	2,268.34	2,268.34	2,268.34	2,268.34	2,268.34	2,268.34	2,268.34	2,268.34	27,220.02
2038	2,268.34	2,268.34	2,268.34	2,268.34	2,268.34	2,268.34	2,268.34	2,268.34	2,268.34	2,268.34	2,268.34	2,268.34	27,220.02
2039	2,268.34	2,268.34	2,268.34	2,268.34	2,268.34	2,268.34	2,268.34	2,268.34	2,268.34	2,268.34	2,268.34	2,268.34	27,220.02
2040	2,268.34	2,268.34	2,268.34	2,268.34	2,268.34	2,268.34	2,268.34	2,268.34	-	-	-	-	18,146.68
Total Projected But For PSERS Retirement Benefits (Option 3)													\$ 825,673.94

Exhibit 10							
David E. Sidelinger							
Employee PSERS Contributions and Prejudgement Interest							
		Employee				Backpay	Interest
	Backpay	Contribution	Employee	Net	Cumulative	Interest	Through
Date	Amount (Gross)	Rate	Contribution	Backpay	Backpay (net)	Rate	9/1/2005
6/30/2000	\$ 7,304.28	5.25%	\$ 383.47	\$ 6,920.81	\$ 6,920.81	6.375%	\$ 111.21
9/30/2000	13,154.01	5.25%	690.59	12,463.42	19,384.23	6.241%	304.93
12/31/2000	13,337.01	5.25%	700.19	12,636.82	32,021.05	6.052%	477.84
3/31/2001	13,337.01	5.25%	700.19	12,636.82	44,657.86	4.19%	466.51
6/30/2001	13,337.01	5.25%	700.19	12,636.82	57,294.68	3.60%	519.89
9/30/2001	13,475.80	6.50%	875.93	12,599.87	69,894.55	2.49%	438.67
12/31/2001	13,753.50	6.50%	893.98	12,859.52	82,754.08	2.28%	465.24
3/31/2002	13,753.50	6.50%	893.98	12,859.52	95,613.60	2.70%	643.62
6/30/2002	13,753.50	6.50%	893.98	12,859.52	108,473.12	2.10%	574.16
9/30/2002	13,896.17	6.50%	903.25	12,992.92	121,466.04	1.68%	514.35
12/31/2002	14,181.51	6.50%	921.80	13,259.71	134,725.75	1.41%	468.40
3/31/2003	14,181.51	6.50%	921.80	13,259.71	147,985.46	1.27%	468.57
6/30/2003	14,181.51	6.50%	921.80	13,259.71	161,245.18	1.02%	414.55
9/30/2003	14,293.72	6.50%	929.09	13,364.63	174,609.80	1.22%	536.94
12/31/2003	14,518.26	6.50%	943.69	13,574.57	188,184.38	1.28%	593.94
3/31/2004	14,518.26	6.50%	943.69	13,574.57	201,758.95	1.17%	588.53
6/30/2004	14,518.26	6.50%	943.69	13,574.57	215,333.52	2.16%	1,172.36
9/30/2004	14,669.97	6.50%	953.55	13,716.42	229,049.95	2.14%	1,235.49
12/31/2004	14,973.51	6.50%	973.28	14,000.23	243,050.18	2.77%	1,660.07
3/31/2005	14,973.51	6.50%	973.28	14,000.23	257,050.41	3.38%	2,166.13
6/30/2005	14,973.51	6.50%	973.28	14,000.23	271,050.64	3.40%	1,565.41
8/31/2005	9,982.30	6.50%	648.85	9,333.45	280,384.09	0.00%	-
	\$ 299,067.62		\$ 18,683.53	\$ 280,384.09			\$ 15,386.80

Note: Employee PSERS contribution rate was 5.25% through June 30, 2001, at which time it switched to 6.50%

Employee PSERS pension contributions at 4% annual interest

Compound Period : Annual

Nominal Annual Rate: 4.000 %
 Effective Annual Rate ...: 4.000 %
 Periodic Rate: 4.0000 %
 Daily Rate: 0.01096 %

CASH FLOW DATA

Event	Start Date	Amount	Number	Period	End Date
1 Deposit	06/30/2000	383.47	1		
2 Deposit	09/30/2000	690.59	1		
3 Deposit	12/31/2000	700.19	1		
4 Deposit	03/31/2001	700.19	1		
5 Deposit	06/30/2001	700.19	1		
6 Deposit	09/30/2001	875.93	1		
7 Deposit	12/31/2001	893.98	1		
8 Deposit	03/31/2002	893.98	1		
9 Deposit	06/30/2002	893.98	1		
10 Deposit	09/30/2002	903.25	1		
11 Deposit	12/31/2002	921.80	1		
12 Deposit	03/31/2003	921.80	1		
13 Deposit	06/30/2003	921.80	1		
14 Deposit	09/30/2003	929.09	1		
15 Deposit	12/31/2003	943.69	1		
16 Deposit	03/31/2004	943.69	1		
17 Deposit	06/30/2004	943.69	1		
18 Deposit	09/30/2004	953.55	1		
19 Deposit	12/31/2004	973.28	1		
20 Deposit	03/31/2005	973.28	1		
21 Deposit	06/30/2005	973.28	1		
22 Deposit	08/31/2005	648.85	1		
23 Withdrawal	09/01/2005	20,580.70	1		

AMORTIZATION SCHEDULE - Normal Amortization

Date	Deposit	Withdrawal	Interest	Net Change	Balance
06/30/2000	383.47		0.00	383.47	383.47
09/30/2000	690.59		3.87	694.46	1,077.93
12/31/2000	700.19		10.87	711.06	1,788.99
2000 Totals	1,774.25	0.00	14.74	1,788.99	
03/31/2001	700.19		17.64	717.83	2,506.82
06/30/2001	700.19		25.00	725.19	3,232.01
09/30/2001	875.93		32.59	908.52	4,140.53
12/31/2001	893.98		41.75	935.73	5,076.26
2001 Totals	3,170.29	0.00	116.98	3,287.27	
03/31/2002	893.98		50.07	944.05	6,020.31

Employee PSERS pension contributions at 4% annual interest

Date	Deposit	Withdrawal	Interest	Net Change	Balance
06/30/2002	893.98		60.04	954.02	6,974.33
09/30/2002	903.25		70.32	973.57	7,947.90
12/31/2002	921.80		80.13	1,001.93	8,949.83
2002 Totals	3,613.01	0.00	260.56	3,873.57	
03/31/2003	921.80		88.27	1,010.07	9,959.90
06/30/2003	921.80		99.33	1,021.13	10,981.03
09/30/2003	929.09		110.71	1,039.80	12,020.83
12/31/2003	943.69		121.20	1,064.89	13,085.72
2003 Totals	3,716.38	0.00	419.51	4,135.89	
03/31/2004	943.69		130.50	1,074.19	14,159.91
06/30/2004	943.69		141.21	1,084.90	15,244.81
09/30/2004	953.55		153.70	1,107.25	16,352.06
12/31/2004	973.28		164.86	1,138.14	17,490.20
2004 Totals	3,814.21	0.00	590.27	4,404.48	
03/31/2005	973.28		172.51	1,145.79	18,635.99
06/30/2005	973.28		185.85	1,159.13	19,795.12
08/31/2005	648.85		134.50	783.35	20,578.47
1 09/01/2005		20,580.70	2.23	20,578.47-	0.00
2005 Totals	2,595.41	20,580.70	495.09	17,490.20-	
Grand Totals	18,683.55	20,580.70	1,897.15	0.00	

Exhibit 12				
David E. Sidelinger				
Summary of Past and Future Economic Damages				
Assuming PSERS Maximum Single Life Annuity Retirement Benefit Selected				
Income Component	Reference	But For Projection	Actual Projection	Amount of Economic Loss
Scenario One: PSERS Maximum Single Life Annuity Retirement Benefit Selected				
Total Past Earnings (Calculated from September 1, 1999 to August 31, 2005)	Exhibit 1	\$ 335,305.00	\$ 36,237.38	\$ 299,067.62
Total Past Fringe Benefits as a Percentage of Payroll (17.1%)		57,337.16	6,196.59	51,140.56
Total Future Earnings	Exhibit 1	908,625.00	-	908,625.00
Total Future Fringe Benefits as a Percentage of Pay (17.1%)		155,374.88	-	155,374.88
Projected Lifetime Monthly PSERS Retirement Benefits				
Maximum Single Life Annuity	Exhibits 7, 4	625,942.08	415,622.72	210,319.36
Less Deduction for Employee's Pension Contribution on Past But For Earnings	Exhibit 10	(18,683.53)	-	(18,683.53)
Less Deduction for Employee's Pension Contribution on Future But For Earnings		(59,060.63)	-	(59,060.63)
Less Deduction for Fair Share Union Fees estimated @ \$395/yr		(7,900.00)	-	(7,900.00)
Conversion of unused accumulated sick days to cash payment at Retirement				
126 unused sick/personal days @\$110/day at termination		13,860.00	13,860.00	-
125 Additional accumulated sick days projected to be available at retirement		13,750.00	-	13,750.00
Adjustment for cost of obtaining 6 CPE Credits (Act 48 teacher certification requirement)				2,476.27
Adjustment for Negative Tax Consequences of Lump Sum Payment				222,648.00
Prejudgment Interest - Backpay	Exhibit 10			15,386.80
Prejudgment Interest - Employee contribution to PSERS Retirement	Exhibit 11			1,897.15
Total Damages				\$ 1,795,041.48

Exhibit 13				
David E. Sidelinger				
Summary of Past and Future Economic Damages				
Assuming PSERS Option 2 Retirement Benefit Selected				
Income Component	Reference	But For Projection	Actual Projection	Amount of Economic Loss
Scenario Two: PSERS Option 2 Retirement Benefit Selected				
Total Past Earnings (Calculated from September 1, 1999 to August 31, 2005)	Exhibit 1	\$ 335,305.00	\$ 36,237.38	\$ 299,067.62
Total Past Fringe Benefits as a Percentage of Payroll (17.1%)		57,337.16	6,196.59	51,140.56
Total Future Earnings	Exhibit 1	908,625.00	-	908,625.00
Total Future Fringe Benefits as a Percentage of Pay (17.1%)		155,374.88	-	155,374.88
Projected Lifetime Monthly PSERS Retirement Benefits				
Option 2	Exhibits 8, 5	989,940.00	556,097.71	433,842.29
Less Deduction for Employee's Pension Contribution on Past But For Earnings	Exhibit 10	(18,683.53)	-	(18,683.53)
Less Deduction for Employee's Pension Contribution on Future But For Earnings		(59,060.63)	-	(59,060.63)
Less Deduction for Fair Share Union Fees estimated @ \$395/yr		(7,900.00)	-	(7,900.00)
Conversion of unused accumulated sick days to cash payment at Retirement				
126 unused sick/personal days @\$110/day at termination		13,860.00	13,860.00	-
125 Additional accumulated sick days projected to be available at retirement		13,750.00	-	13,750.00
Adjustment for cost of obtaining 6 CPE Credits (Act 48 teacher certification requirement)				2,476.27
Adjustment for Negative Tax Consequences of Lump Sum Payment				222,648.00
Prejudgment Interest - Backpay	Exhibit 10			15,386.80
Prejudgment Interest - Employee contribution to PSERS Retirement	Exhibit 11			1,897.15
Total Damages				\$ 2,018,564.41

Exhibit 14				
David E. Sidelinger				
Summary of Past and Future Economic Damages				
Assuming PSERS Option 3 Retirement Benefit Selected				
Income Component	Reference	But For Projection	Actual Projection	Amount of Economic Loss
Scenario Three: PSERS Option 3 Retirement Benefit Selected				
Total Past Earnings (Calculated from September 1, 1999 to August 31, 2005)	Exhibit 1	\$ 335,305.00	\$ 36,237.38	\$ 299,067.62
Total Past Fringe Benefits as a Percentage of Payroll (17.1%)		57,337.16	6,196.59	51,140.56
Total Future Earnings	Exhibit 1	908,625.00	-	908,625.00
Total Future Fringe Benefits as a Percentage of Pay (17.1%)		155,374.88	-	155,374.88
Projected Lifetime Monthly PSERS Retirement Benefits				
Option 3	Exhibits 9, 6	825,673.94	491,448.75	334,225.19
Less Deduction for Employee's Pension Contribution on Past But For Earnings	Exhibit 10	(18,683.53)	-	(18,683.53)
Less Deduction for Employee's Pension Contribution on Future But For Earnings		(59,060.63)	-	(59,060.63)
Less Deduction for Fair Share Union Fees estimated @ \$395/yr		(7,900.00)	-	(7,900.00)
Conversion of unused accumulated sick days to cash payment at Retirement				
126 unused sick/personal days @\$110/day at termination		13,860.00	13,860.00	-
125 Additional accumulated sick days projected to be available at retirement		13,750.00	-	13,750.00
Adjustment for cost of obtaining 6 CPE Credits (Act 48 teacher certification requirement)				2,476.27
Adjustment for Negative Tax Consequences of Lump Sum Payment				222,648.00
Prejudgment Interest - Backpay	Exhibit 10			15,386.80
Prejudgment Interest - Employee contribution to PSERS Retirement	Exhibit 11			1,897.15
Total Damages				\$ 1,918,947.31

Exhibit 15				
David E. Sidelinger				
Summary of Past Economic Damages				
Income Component	Reference	But For Projection	Actual Projection	Amount of Economic Loss
Scenario Four: Damages Limited to Back Pay Only				
Total Past Earnings (Calculated from September 1, 1999 to August 31, 2005)	Exhibit 1	\$ 335,305.00	\$ 36,237.38	\$ 299,067.62
Total Past Fringe Benefits as a Percentage of Payroll (17.1%)		57,337.16	6,198.59	51,140.56
Less Deduction for Fair Share Union Fees estimated @ \$395/yr		(1,975.00)	-	(1,975.00)
Adjustment for cost of obtaining 6 CPE Credits (Act 48 teacher certification requirement)				2,476.27
Adjustment for Negative Tax Consequences of Lump Sum Payment				44,548.00
Prejudgment Interest - Backpay	Exhibit 10			15,386.80
Prejudgment Interest - Employee contribution to PSERS Retirement	Exhibit 11			1,897.15
Total Damages				\$ 412,541.40

CURRICULUM VITAE

Daniel E. Sloppy, CPA, CVA, MBA

Certified Public Accountant (Pennsylvania) - 1991
Certified Public Accountant (Florida) - 2005
Certified Valuation Analyst - 1999

Position:

Senior Manager
Schaffner, Knight, Minnaugh & Company, P.C.
Erie, Pennsylvania
Phone: (814) 454-1997 Extension 206
E-mail: dsloppy@skmco.com

Professional Experience:

Over fourteen years of diverse experience in providing businesses with integrated accounting, tax, and management consulting services. Extensive experience in tax compliance matters.

Extensive experience in preparation of business valuation reports for various purposes, including minority shareholder disputes, divorce settlements, potential sales of a business, as well as for estate and gift tax reporting. Prior engagements also have included consultation on lost earnings, economic damages and divorce issues.

Professional Memberships:

American Institute of Certified Public Accountants
Pennsylvania Institute of Certified Public Accountants
National Association of Certified Valuation Analysts
National Association of Forensic Economics

Education:

Pennsylvania State University (Behrend College), Master of Business Administration, 1994
Edinboro University of Pennsylvania, Bachelor of Science in Accounting, 1988

Court Experience:

Qualified as an expert in business valuation in the Court of Common Pleas of Warren County, Pennsylvania. Qualified as an expert in income tax matters in the Court of Common Pleas of Erie County, Pennsylvania.

Daniel E. Sloppy, Curriculum Vitae
Continued

Cases in Which Testimony Given:

PACSES Case Number 565101860, Joan L. Martin v. Andrew C. Martin, Court of Common Pleas of Erie County, Pennsylvania, June 1, 2000.

Case No. 288 of 1998, Linda W. Loranger v. J. Albert Loranger, Jr., Court of Common Pleas of the 37th Judicial District (Warren County, Pennsylvania), August 16, 2000.

Raymond J. v. Elizabeth Sammartino, Court of Common Pleas of Erie County, Pennsylvania, January 28, 2003.

Publications:

"A Section 529 Plan Offers A Better Way to Save for College" Manufacturer's Association of Northwest Pennsylvania Business Magazine, January 2001.

"Does your Company Qualify for the R&D Tax Credit?" Manufacturer's Association of Northwest Pennsylvania Business Magazine, December 2002.

"Do You Qualify for a Home Office Deduction?" Manufacturer's Association of Northwest Pennsylvania Business Magazine, July 2003.

"New Rules! Are You Maximizing Your Depreciation Deduction?" Manufacturer's Association of Northwest Pennsylvania Business Magazine, September 2003

"Vehicle Allowances" Manufacturer's Association of Northwest Pennsylvania Business Magazine, February 2004.

"Section 529 Offers A Better Way to Save for College" Manufacturer's Association of Northwest Pennsylvania Business Magazine, January 2005.